

### **REMARKS**

Claims 1-17 are currently pending in the subject application and are presently under consideration. Claim 1 has been amended to further emphasize various novel aspects of the invention. Claims 12 and 15 have been cancelled. A current listing of the claims is shown at pp. 2-4 of the Reply.

Applicants' representative thanks the Examiner for the courtesies extended over the telephone on Oct 29, 2007. The main focus of the interview was on deficiencies of the 35 U.S.C. §103(a) rejection's. While the presented matter generally related to all the claims, the crux was upon independent claims 1, 9, 10, and 11. In particular, the cited references Birsan and Le Hegaret were discussed in the interview. Also, it was highlighted that Le Hegaret is not a valid prior art. However, no agreements were reached.

Favorable reconsideration of the subject patent application is respectfully requested in view of the comments and amendments herein.

#### **I. Rejection of Claims 1-17 Under 35 U.S.C. §103(a)**

Claims 1-17 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Birsan in view of Le Hegaret. It is respectfully requested that this rejection be withdrawn for at least the following reasons. Birsan and Le Hegaret, taken alone or in combination, fail to disclose or suggest each and every element set forth in the subject claims.

Applicants' claimed subject matter relates generally to analyzing features of one or more documents, and representing such document(s) with unique domain models to facilitate locating, indexing, and categorizing, for example, such document(s). In particular, independent claim 1 recites *a computer-implemented method to process a document, comprising: analyzing features of a document; generating a set of domain models, as a function of the analyzed features, that represent the document; storing the set of domain models along with other domain models associated with representing other documents.* The claimed invention further provides for a search and retrieval mechanism that provides for searching and retrieving the collection of model documents by various model properties. Performing such a search and retrieval of the documents allows the requesting system to retrieve models and/or the original documents for further analysis. To this end, independent claim 1 further recites *structuring the stored domain models so as to be searchable by a querying system; and retrieving a collection of domain*

*models in response to a search performed on the document for further analysis for specific properties.* Independent claims 9, 10, and 11 recite similar features. Birsan and Le Hegaret fail to disclose such novel aspects of the claimed invention.

Birsan merely relates to object oriented programming systems, and more particularly to a system for updating a domain model and generating a formatted output. Accordingly, Birsan provides for two principal functions: (a) text format generation from a source data model; and (b) manipulation of the document-object-model (DOM) tree for the domain model. However, Birsan is silent with respect to generating a set of domain models that represent a particular document. Furthermore, Birsan is silent with respect to storing the generated models with other models representing other documents and a query and retrieval system that provide a collection of domain models in response to a query. In addition Birsan fails to disclose or suggest analyzing the properties of the set of domain models retrieved for further analysis. On the other hand, the claimed invention provides for *retrieving a collection of domain models in response to a search performed on the document for further analysis for specific properties.* For example, the claimed invention provides for the collection of models to be statistically analyzed for collective properties (e.g., averages, minimum/maximum values, clustering analysis etc.).

In the subject Office Action, the Examiner concedes that Birsan fails to disclose or suggest *generating a set of domain models* and offers Le Hegaret to cure this deficiency. Applicants' representative respectfully disagrees. Le Hegaret merely provides an introduction to document object model (DOM). Le Hegaret discloses that a DOM is an application programming interface (API) for valid HTML and well-formed XML documents. Le Hegaret further discloses that DOM defines the logical structure of documents and the way a document is accessed and manipulated. In the cited reference, Le Hegaret clearly states that the term "document" is used in a broader sense and primarily represents data. Furthermore, the DOM is merely an "object model" in the traditional object oriented design sense. On the other hand, the claimed invention provides for generating models for particular domains to represent documents. For example, Fig. 3 of the Specification discloses the creation of models for the breast cancer domain. Accordingly, various models, including condition, treatment modes, drugs, diagnostics, are created to represent this particular domain. Accordingly, the claimed invention provides for representing a particular document on cancer using these models. Le Hegaret is completely silent about any such process. Furthermore, the Examiner incorrectly contends that Le Hegaret

generates *a set of domain models* for representing a document. Moreover, assuming that Le Hegaret discloses the generation of a set of domain models, Le Hegaret is completely silent about *a retrieving a collection of domain models in response to a search performed on the document for further analysis for specific properties*.

In view of at least the foregoing, it is respectfully submitted that Birsan and Le Hegaret, taken alone or in combination, fail to disclose or suggest each and every element set forth in the subject claims. Therefore, it is respectfully submitted that this rejection should be withdrawn.

**CONCLUSION**

The present application is believed to be in condition for allowance in view of the above comments and amendments. A prompt action to such end is earnestly solicited.

In the event any fees are due in connection with this document, the Commissioner is authorized to charge those fees to Deposit Account No. 50-1063 [MSFTP1836USA].

Should the Examiner believe a telephone interview would be helpful to expedite favorable prosecution, the Examiner is invited to contact applicants' undersigned representative at the telephone number below.

Respectfully submitted,

AMIN, TUROC & CALVIN, LLP

/Himanshu S. Amin/

Himanshu S. Amin

Reg. No. 40,894

AMIN, TUROC & CALVIN, LLP  
24<sup>TH</sup> Floor, National City Center  
1900 E. 9<sup>TH</sup> Street  
Cleveland, Ohio 44114  
Telephone (216) 696-8730  
Facsimile (216) 696-8731